

CARLOS BRACERAS, P.E., PRESIDENT EXECUTIVE DIRECTOR, UTAH DEPARTMENT OF TRANSPORTATION

JIM TYMON, EXECUTIVE DIRECTOR

444 NORTH CAPITOL STREET NW, SUITE 249, WASHINGTON, DC 20001 (202) 624-5800 • FAX: (202) 624-5806 • WWW.TRANSPORTATION.ORG

August 19, 2019

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street, Southwest Washington, DC 20554

Dear Chairman Pai:

As Members of the American Association of State Highway and Transportation Officials (AASHTO) representing the state departments of transportation (state DOTs) of all 50 states, the District of Columbia, and Puerto Rico, we urge you to continue our nation's commitment to improving transportation safety by reserving the 5.9 GHz wireless spectrum for this critical purpose. The top priority for the state DOTs and AASHTO has been—and will always remain—the safety of all transportation system users. The loss of 36,750 lives last year on our nation's highways and streets demands that we act boldly. To this end, connected vehicles (CV) utilizing Vehicle-to-Everything (V2X) communication in the 5.9 GHz spectrum will save lives by creating a seamless, cooperative environment that significantly improves the safety of our transportation system.

As infrastructure owners and operators of the nation's surface transportation infrastructure, state and local transportation agencies are at the core of creating the optimal CV environment. While automakers and device manufacturers will dictate availability of vehicular equipment, transportation agencies will control the deployment and operation of roadside infrastructure and the incorporation of CV technologies into infrastructure applications. Together, the public and private sectors have already invested hundreds of millions of dollars to develop and deploy lifesaving CV technologies in the 5.9 GHz spectrum.

State DOTs fully recognize that there is no current agreement among the transportation industry on which particular technology will be used to broadly deploy V2X applications. That being said, the current debate among stakeholders in the transportation industry on how best to use the 5.9 GHz spectrum should not be an excuse to open the spectrum for non-transportation safety purposes; rather, by preserving the spectrum, it will facilitate the transportation industry to agree on the best technology solution to broadly deploy V2X applications.

In closing, state DOTs understand that a CV environment holds the potential to support a fundamental advancement in ensuring the safety of our nation's surface transportation system. And in order for this promising future to become a reality, the 5.9 GHz spectrum must be preserved for transportation safety purposes.

If you would like to discuss the issues raised in this letter, please contact Joung Lee, AASHTO's Policy Director, at 202-624-5818 or jlee@aashto.org.

cc:

Carlos Braceras President, AASHTO

Executive Director. Utah Department of Transportation

Jim Tymon
Executive Director
AASHTO

Shoshana Lew

Executive Director

Joseph Giulietti

Commissioner

John R. Cooper

Transportation Director

Alabama Department of Transportation

John R. Cooper

John MacKinnon

Comissioner

Alaska Department of Transportation and Public Facilities

John S. Halikowski

Director

Arizona Department of Transportation

Jennifer Lynn Cohan

Secretary of Transportation

Delaware Department of Transportation

Colorado Department of Transportation

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Scott Bennett

Director

Arkansas Department of Transportation

Bob Franzoia

Acting Director

California Department of Transportation

Jeff Marootian

Director

District of Columbia Department of Transportation

Kevin J. Thibault

Secretary of Transportation

Florida Department of Transportation

Paurell a Mª Marry

Russell R. McMurry

Commissioner

Georgia Department of Transportation

Jade Butay Director

Hawaii Department of Transportation

em W. News

Brian W. Ness

Director

Idaho Transportation Department

Omer Osman

Acting Secretary

Illinois Department of Transportation

Joe McGuinness Comprissioner

Indiana Department of Transportation

Mark Lowe

Director

Iowa Department of Transportation

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Secretary of Transportation

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Paul C. Ajegba

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Commissioner

Minnesota Department of Transportation

Margaret Anderson Kelliher

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Executive Director

Mississippi Department of Transportation

Patrick K. McKenna

Director

Missouri Department of Transportation



Mike Tooley

Director

Montana Department of Transportation

Kyle Schneweis

Director

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Director

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Cabinet Secretary

New Mexico Department of Transportation

Marie Have Doming

Marie Therese Dominguez

Commissioner

New York State Department of Transportation

Jan John to

James H. Trogdon

Secretary of Transportation

North Carolina Department of Transportation

Ron Henke

Interim Director

North Dakota Department of Transportation

Jack Marchbanks

Director

Ohio Department of Transportation

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Tim J. Gatz

Secretary of Transportation/Executive Director Oklahoma Department of Transportation

Paul R. Mather

Interim Deputy Director

Oregon Department of Transportation

Leslie Richards

Secretary

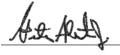
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Carlos Maximino Contreras

Secretary

Puerto Rico Department of Transportation and Public Works



Peter Alviti

Director

Rhode Island Department of Transportation

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Secretary of Transportation

South Carolina Department of Transportation

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Jimmy Wriston, P. E

Jimmy D. Wriston

Acting Commissioner

West Virginia Department of Transportation

Craig Thompson

Secretary

Wisconsin Department of Transportation

Luke Reiner

Director

Wyoming Department of Transportation

cc:

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The Honorable Brendan Carr, Commissioner

The Honorable Jessica Rosenworcel, Commissioner

The Honorable Geoffrey Starks, Commissioner